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Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	CASE NO. CR-15-00205 WHA
)	
v.)	
)	
JAQUAN DESHAWN TAYLOR,)	STIPULATION AND PROPOSED ORDER
)	
Defendant.)	
)	
)	
)	

The Government, by and through its attorney, Laurie Kloster Gray, and defendant, by and through his attorney, Geoffrey A. Hansen, respectfully submit this Stipulation and Proposed Order setting motion hearing and filing dates, and excluding time from the Speedy Trial Act calculation in the above-captioned matter. The parties hereby stipulate and agree to the following:

1. The parties appeared before the Court on May 5, 2015. The Court set the following dates in the case: defendant will file his motion to suppress on May 26, the government will file its response on June 16, and defendant will file his reply on June 23. The Court will hear argument on the motion to suppress on June 30, 2015, at 2:00 p.m.

2. Counsel for defendant requested that time be excluded under the Speedy Trial Act between May 5, 2015, and the June 30, 2015 motions hearing date, to conduct and complete necessary

1 investigation in order to file a motion to suppress. The government stated that it had no objection to this
2 exclusion of time.

3 3. The parties now formalize their request that the period from May 5, 2015 through and
4 including June 30, 2015, be excluded from the Speedy Trial Act computation pursuant to 18 U.S.C.
5 § 3161(h)(7)(B)(iv) because failure to grant the requested continuance would unreasonably deny
6 defendant the reasonable time necessary for effective preparation, taking into account the exercise of
7 due diligence. Specifically, the parties represent that defense counsel's need to conclude necessary
8 investigation prior to filing his motion to suppress support the requested continuance.

9 IT SO STIPULATED.

10 DATED: May 6, 2015

MELINDA HAAG
United States Attorney


11
12 By: /s/
13 LAURIE KLOSTER GRAY
Assistant United States Attorney

14 DATED: May 6, 2015

/s/
15 GEOFFREY A. HANSEN
16 Assistant Federal Public Defender
Counsel for Jaquan Deshawn Taylor

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18 FOR THE REASONS SET FORTH ABOVE, time under the Speedy Trial Act shall be excluded
19 from May 5, 2015 through June 30, 2015.

20 DATED: May 13, 2015


21 HON. WILLIAM H. ALSUP
United States District Judge
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